

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

Google LLC, YouTube LLC, James JACKSON, also known online as “ONISION,” and LUCAS JACKSON, formerly known online as “LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE No: 1:23-cv-00223-HYJ-SJB

HON. HALA Y. JARBOU

**UNOPPOSED MOTION BY DEFENDANTS GOOGLE LLC AND YOUTUBE, LLC
FOR LEAVE TO FILE REPLY BRIEF IN SUPPORT OF MOTION TO TRANSFER**

Pursuant to Local Rule 7.3(c), Defendants Google LLC and YouTube LLC (collectively, “YouTube”) move this Court for leave to file a Reply Brief in support of their Motion to Transfer to the Northern District of California (“Reply”). In support, YouTube states:

1. On May 19, 2023, YouTube filed a Motion to Transfer the instant case to the Northern District of California. *See* ECF No. 37.¹
2. On June 2, 2023, Plaintiff filed a Response in Opposition to Defendants’ Motion to Transfer. *See* ECF No. 45. Therein, Plaintiff challenged the applicability of the governing forum-selection clause and misstated or ignored the controlling framework of *Atlantic Marine Constr. Co. v. United States Dist. Ct. for the W. Dist. Of Texas*, 571 U.S. 49 (2013).
3. YouTube seeks leave to file the proposed Reply, attached hereto as **Exhibit I**, which will clarify the issues at hand and assist in the adjudication of this case.

¹ YouTube re-filed the Motion to Transfer and Brief in Support on May 22, 2023 to correct a technical issue. *See* ECF Nos. 42, 43.

4. YouTube also attaches for the convenience of the Court as **Exhibit A to Exhibit I** another copy of the Declaration of Raquel Small dated May 12, 2023, originally filed with its motion to transfer on May 19, 2023 (ECF No. 37, PageID.402-404).

5. Accordingly, YouTube moves the Court pursuant to Local Rule 7.3(c) for leave to file a reply brief not to exceed 4,300 words in support of its Motion to Transfer. On June 6, 2023, Defendants' counsel sought the concurrence of Plaintiff's counsel in the relief requested. On June 9, 2023, Plaintiff's counsel responded that Plaintiff does not oppose the motion for leave to reply.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that this Court grant Defendants leave to file a Reply in support of their Motion to Transfer.

Respectfully submitted,

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DATE: June 16, 2023

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DATE: June 16, 2023

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GOOGLE LLC and YOUTUBE, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served upon all parties and/or attorneys of record to the above cause herein at their respective addresses as disclosed on the pleadings on June 16, 2023, via:

_____ U.S. Mail	_____ Facsimile
<u> X </u> ECF Filing	_____ Hand Delivery
_____ E-Mail	_____ Federal Express

By: /s/ Christopher M. Trebilcock
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